

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: **George Brown** : Chapter 13
:
:
Debtor : Bankruptcy No.: **18-15005**

REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to F.R.C.P. 34, Objectors hereby request that the Respondent produce for inspection by the undersigned counsel for the Objectors, the following documents:

1. Respondent in its proof of claim alleges Objector has missed **Principal & Interest Due** in the total amount of **\$12,792.24**. Objector, therefore, requests that Respondent provide a monthly mortgage payment history.
2. Respondent alleges in the Proof of Claim **Prepetition Fees due** in the amount of **\$520.00**. Objectors, therefore, requests that Respondent provide a photocopy of the aforesaid fees, in addition to photocopy of paid invoice and/or cancelled check for same and furthermore, attorney time sheets and/or reports prepared.
3. Respondent alleges in the Proof of Claim **Escrow deficiency for funds advanced** in the amount of **\$3,375.07**. Objectors, therefore, requests that Respondent provide a photocopy of the aforesaid funds advanced, proof of insurance policies in addition to photocopy of paid invoices and/or cancelled check for same.
4. Respondent alleges in the Proof of Claim **Escrow deficiency for funds advanced** in the amount of **\$1,198.94**. Objectors, therefore, requests that Respondent provide a photocopy of the of method used to calculate the projected escrow shortage.

Respectfully submitted,

By: /s/ Michael D. Sayles Esquire
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